

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

(1) **PINNACLE PACKAGING COMPANY, INC.**, an Oklahoma corporation,
(2) **POLO ROAD LEASING, LLC**, an Oklahoma limited liability company, and
(3) **J. SCOTT DICKMAN**,

Plaintiffs,

v.

Case No. 12-CV-537-JED-TLW

(1) **ONE EQUITY PARTNERS LLC**, a Delaware limited liability company,
(2) **ONE EQUITY PARTNERS (EUROPE) GmbH**, and (3) **CONSTANTIA FLEXIBLES GmbH**,
an Austrian corporation,

Defendants.

**DEFENDANTS ONE EQUITY PARTNERS LLC,
ONE EQUITY PARTNERS (EUROPE) GMBH, AND
CONSTANTIA FLEXIBLES GMBH'S UNOPPOSED
MOTION TO EXTEND TIME TO FILE REPLY**

Defendants One Equity Partners LLC, One Equity Partners (Europe) GmbH, and Constantia Flexibles GmbH move for a ten-day extension of time to reply to Plaintiffs' opposition to Defendants' motion to dismiss. Defendants' reply is due on Friday, October 11. Defendants move for the deadline to be extended to October 21.

1. Plaintiffs do not oppose Defendants' request for additional time.
2. Defendants' principal counsel, Gabrielle Gould, and one of her colleagues assigned to defend this matter, Aaron Lang, will be traveling to Europe on business from October 8 through 13, during the time this brief is due. Plaintiffs' opposition to Defendants' motion to dismiss comprised 45 pages of text and nearly 1,200 pages of

exhibits. Defendants request the additional time to review the extensive exhibits and prepare their reply. In light of counsels' travel schedule and the extensive materials filed with Plaintiffs' opposition, Defendants have good cause to extend the deadline to reply.

WHEREFORE, Defendants move for an order extending by ten days, to October 21, 2013, the deadline for Defendants to reply to Plaintiffs' opposition to Defendants' Motion to Dismiss.

Dated: 23 September 2013

s/ John D. Russell

John D. Russell, OBA No. 13343
Charles R. Willing, OBA No. 15873
FELLERS, SNIDER, BLANKENSHIP,
BAILEY & TIPPENS, P.C.
321 S. Boston Avenue, Suite 800
Tulsa, Oklahoma 74103
Telephone (918) 599-0621
Facsimile (918) 583-9659
jrussell@fellerssnider.com
cwilling@fellerssnider.com

and

Gabrielle Gould, *Pro Hac Vice*
Cheryl Howard, *Pro Hac Vice*
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
601 Lexington Avenue, 31st Floor
New York, New York 10022
Telephone (212) 277-4000
Facsimile (212) 277-4001
gabrielle.gould@freshfields.com
cheryl.howard@freshfields.com

**COUNSEL FOR DEFENDANTS
ONE EQUITY PARTNERS LLC,
ONE EQUITY PARTNERS
(EUROPE) GMBH, AND
CONSTANTIA FLEXIBLES GMBH**

CERTIFICATE OF SERVICE

I hereby certify that on 23 September 2013, I electronically transmitted DEFENDANTS ONE EQUITY PARTNERS LLC, ONE EQUITY PARTNERS (EUROPE) GMBH, AND CONSTANTIA FLEXIBLES GMBH'S UNOPPOSED MOTION TO EXTEND TIME TO FILE REPLY BRIEF to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Laurence Lindsay Pinkerton – pf@att.net

James David Jorgenson – pf@att.net

COUNSEL FOR PLAINTIFFS

s/John D. Russell

John D. Russell

09924.29730